## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:	)
	) Chapter 11
Lehman Brothers Holdings, Inc., et al.,	)
	) Case No. 08-13555 (JMP)
	) (Jointly Administered)
Debtors.	)

FOURTH SUPPLEMENTAL AFFIDAVIT OF MICHAEL EISENBAND
IN SUPPORT OF APPLICATION FOR AN ORDER FOR
RETENTION OF FTI CONSULTING, INC. AS
FINANCIAL ADVISORS FOR THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS

STATE OF NEW YORK	)
	) ss
COUNTY OF NEW YORK	)

- I, Michael Eisenband, being duly sworn, hereby depose and say:
- 1. I am a senior managing director at FTI Consulting, Inc. ("FTI"), which maintains offices at various locations around the country, including Three Times Square, 10<sup>th</sup> Floor, New York, NY 10036, USA. I submit this affidavit (the "Eisenband Fourth Supplemental Affidavit" or "Affidavit") to supplement my prior affidavits that were submitted in connection with FTI's retention in the above mentioned chapter 11 cases (collectively the "Debtors"). Unless otherwise stated in this Eisenband Fourth Supplemental Affidavit, I have personal knowledge of the facts set forth herein.
- 3. On October 21, 2008, the Official Committee of Unsecured Creditors (the "Committee") appointed in the chapter 11 cases filed an Application for Employment of FTI Consulting, Inc. as its Financial Advisors (the "Application"). In support of the Application, FTI filed an affidavit executed by the undersigned on behalf of FTI in accordance with the applicable

sections of title 11 of the United States Code, 11 U.S.C. § § 101-1532 (as amended, the "Bankruptcy Code") (the "Original Affidavit"). On November 21, 2008, a Final Order was signed authorizing the Retention and Employment of FTI, effective as of September 17, 2008. On January 23, 2009, FTI filed a supplemental affidavit executed by the undersigned on behalf of FTI in accordance with the applicable sections of the Bankruptcy Code ("Eisenband Supplemental Affidavit"). On April 6, 2009, FTI filed a supplemental affidavit executed by the undersigned on behalf of FTI in accordance with the applicable sections of the Bankruptcy Code ("Eisenband Second Supplemental Affidavit"). On June 19, 2009, FTI filed a supplemental affidavit executed by the undersigned on behalf of FTI in accordance with the applicable sections of the Bankruptcy Code ("Eisenband Third Supplemental Affidavit", collectively the "Prior Affidavits").

- 4. In connection with the preparation of the Original Affidavit, FTI conducted a review of its contacts with the Debtors, their affiliates and certain entities holding large claims against or interests in the Debtors that were made reasonably known to FTI. Subsequent to the filing of the Original Affidavit, it has come to my attention that:
  - a. FTI's strategic communications practice in London was engaged by Neuberger Berman Europe Limited in March 2010 to assist with public relations communications support related to the IPO of a private equity fund. Professionals involved in this manner will not be involved with the services provided on behalf of the Committee.
  - b. FTI was retained by the Liquidating Trustee of the Mortgage Lenders Network ("MLN") Liquidating Trust on June 8, 2009. Prior to the formation of the Trust, FTI was retained by the Unsecured Creditors Committee of MLN. Aurora Loan Services LLC, on behalf of Lehman Brothers Holdings

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> Inc. ("LBHI"), Lehman Brothers Bank, FSB ("LBB) and certain Trusts has filed an unsecured claim ("Aurora Claim") against MLN. Aurora is the master servicer for LBHI, LBB and various other bankruptcy remote mortgage loan securitization Trusts that hold mortgage loans originated by the Debtor. FTI will not be involved in the analysis and reconciliation of the Aurora claim.

Insofar as I have been able to ascertain and subject to the disclosures herein and in 6. my prior affidavit, FTI does not represent any interests adverse to the Official Committee of Unsecured Creditors and, to the best of my knowledge, remains a "disinterested person" as that term is defined in Section 101(14), as modified by Section 1107(b), of the Dankruptcy Code.

Machael Eisenband

SUBSCRIBED AND SWORN TO BEFORE ME this gtn day of April 2010.

My Commission Expires: